



180 MAIDEN LANE, 6th FLOOR, NEW YORK, NY 10038
info@spi-pc.com | T: (646) 787-9880 | F: (646) 787-9886

SAM P. ISRAEL
FOUNDER & MANAGING PARTNER

Eleonora Zlotnikova
Timothy Foster
Timothy Savitsky
David Hrovat
Associates

BY: ECF

Honorable Sarah L. Cave
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

June 4, 2020

Re: Lara Fashion Limited, et al. v. Habib Arazi, et al., No. 1:18-cv-09105 (SLC)

Dear Judge Cave,

We write as counsel to Lara Fashion Limited and New Fairsel Limited (together, the “Plaintiffs”) to update Your Honor on the progress of the parties’ settlement discussions per the Court’s order dated May 21, 2020. *See* ECF **Dkt. 69**. As of this afternoon—and following more than a week of settlement discussions—the parties are close to reaching alternative settlement terms. However, such terms have not been finalized.

In order to limit further delay in this matter yet still provide the parties with an opportunity to complete settlement and execute a formal agreement, we respectfully request that the Court permit the Plaintiffs until June 11, 2020 to file their motion to enforce the prior settlement terms, and provide the Defendants with 21 days to file an opposition. In anticipation of a circumstance in which the motion to enforce the prior settlement is ultimately denied, we further request the Court order that any deposition of Mr. Arazi be held on or before July 1, 2020. In the event a new and alternative settlement is finalized by June 11, 2020 (as we hope and expect it will be), both these procedural deadlines will be obviated.

All parties consent to the schedule set forth above. We thank Your Honor for the Court’s attention to this matter.

Respectfully submitted:

SAM P. ISRAEL, P.C.

By: /s/Timothy Savitsky
Timothy Savitsky (TS6683)
Counsel for Plaintiffs

Plaintiffs' Letter-Motion for an extension of time (ECF No. 70) is GRANTED. By **Thursday, June 11, 2020**, the parties must file a joint letter stating whether their settlement terms have been finalized. If not, Plaintiffs are directed to file their motion to enforce the parties' prior settlement terms by **Thursday, June 11, 2020**, with Defendants' opposition due by **Thursday, July 2, 2020**. If Plaintiffs' motion is denied, the deposition of Mr. Habib Arazi must be held by **Wednesday, July 1, 2020**. If the parties' settlement terms are finalized before June 11, 2020, all other dates will be terminated. The Clerk of Court is respectfully directed to close ECF No. 70.

SO-ORDERED 6/5/2020


SARAH L. CAVE
United States Magistrate Judge